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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: NICKELODEON CONSUMER  
PRIVACY LITIGATION

MDL No. 2443

No. 2:12-cv-07829-SRC-CLW

Oral Argument Requested

This Document Relates To: ALL CASES

Return Date: April 21, 2014

**NOTICE OF MOTION**

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**PLEASE TAKE NOTICE** that, on April 21, 2014, or as soon thereafter as counsel may be heard, Defendant Viacom, Inc., by and through its attorneys Debevoise & Plimpton LLP and Blank Rome LLP, will move before the Honorable Stanley R. Chesler, United States District

Judge, for an Order granting Defendant's Motion to Dismiss the Master Consolidated Class Action Complaint pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), and for such other relief as the Court may award.

**PLEASE TAKE FURTHER NOTICE** that, in support of their Motion, Defendant relies upon the arguments presented in the Memorandum of Law in Support of Defendant Viacom Inc.'s Motion to Dismiss the Master Consolidated Class Action Complaint, the Declaration of Kristin L. Bryan, executed on January 12, 2014, the pleadings of the record, and oral argument, which is specifically requested. Also submitted herewith for the Court's consideration is a proposed form of Order.

DATED: January 15, 2014

DEBEVOISE & PLIMPTON LLP

By: /s/ Bruce P. Keller

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